

January 30, 2002

Dockets Management System
U.S. Department of Transportation
Room PL 401
400 Seventh Street, SW
Washington, DC 20590-0001

RE: Docket Number RSPA-2002-13658 (HM-215E)

Gentlemen:

Mallinckrodt Pharmaceuticals, a division of Tyco International, submits the following comments to the referenced docket. Mallinckrodt Pharmaceuticals is a producer of Specialty Chemicals and Pharmaceuticals and a shipper of hazardous materials. Mallinckrodt Pharmaceuticals ships approximately 50,000 hazardous material shipments per year.

While Mallinckrodt Pharmaceuticals supports the intent of the proposed regulations and the efforts to harmonize the HMR with the new international standards, we have some specific concerns with some of the proposed changes. Our comments and recommendations are listed below.

Section 172.315

Mallinckrodt supports the recommendation from PPG Industries that the proposed changes for limited quantity marking be made effective to all domestic shipments as well as international. This will allow for consistent marking requirements of limited quantities for those shippers who ship both domestically and internationally of which Mallinckrodt is one. This will increase compliance while reducing the burden to shippers.

Section 172.323

Mallinckrodt supports the position of the Air Line Pilots Association (ALPA) that the current proposal for an Air Eligibility (AE) mark, as defined, is not an effective means to increase compliance with air transport packaging requirements due to the use of forwarders and has the capability of being misused in order to expedite shipments. We recommend that the current proposal for the Air Eligibility mark not be adopted.

We appreciate the opportunity to provide comments on this rule. Please contact me if there should be any questions or if any additional information concerning these comments is needed.

Sincerely,

Paul Wobbe
Manager of Transportation and Logistics